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December 12, 2023

**Via ECF**

Honorable Julien Xavier. Neals, USDJ  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, New jersey 07101

Re: Parks, Nijer v. McCormack, John E., et al  
Civil Action No.: 2:21-CV-04021 DOL# 21-00054

Dear Judge Neals:

The Woodbridge Defendants filed a Motion for Summary Judgement on December 6, 2023, and the Court has set the return date as January 2, 2024. Plaintiff hereby requests that the return dat

My adversary, Gary Clemente, has graciously consented to adjourn this matter two return dates, that is until February 5, 2024. Plaintiff's Opposition papers would then be due on January 22, 2024. I require this additional time because I am a solo practitioner, this is an important and complex matter and the Christmas holiday is upon us.

Thank you for your continued courtesies in this regard.

Respectfully submitted,

/s/

Daniel W. Sexton

DWS/swd  
cc *Client via email only*